

Foley, Erin Dougherty

From: summer.campbell0410@gmail.com
Sent: Sunday, August 31, 2025 3:52 PM
To: Foley, Erin Dougherty
Cc: Remish, Madeline E.
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

This Message Is From an External Sender

This message came from outside your organization.

Good afternoon,

I am writing to acknowledge receipt of your request for supplementation and to thank you for your patience. I have prioritized compliance with the Court's deadlines, but I am working to fulfill your request.

You asked for medical records from 2015 forward, as well as a release of information for Dr. Engelbrecht. I will make every effort to provide you with the screening portion of Dr. Engelbrecht's evaluation later this week. The diagnostic report I provided you on June 16, 2025, contains extensive information regarding her testing methods. I will not sign a release of information at this time, but I am open to continuing the discussion when/if you pursue a Rule 35 independent medical evaluation.

To the best of my knowledge, the only medical records you do not already have would be:

- 1) A tetanus vaccination in 2015 administered at my college clinic,
- 2) COVID-19 vaccination records, and
- 3) A handful of visits to the dentist.

We can discuss the necessity of those records with the Court on September 5, 2025. I am not trying to be difficult or evasive. Rather, I do not have a dense medical history, and I have already provided you an ROI for all substantial providers.

Thank you,

Summer Campbell

From: Foley, Erin Dougherty <EDFoley@seyfarth.com>
Sent: Monday, August 25, 2025 5:52 PM
To: summer.campbell0410@gmail.com

Cc: Remish, Madeline E. <mremish@seyfarth.com>

Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Ms. Campbell:

Respectfully, we do believe that we are entitled to a broader set of medical records in light of several statements you made in multiple TikTok videos and in response to our interrogatories in which you claim to suffer from PTSD and other mental health conditions. Particularly as they related to allegations of abuse, your earlier medical records may provide additional information regarding those issues. Additionally, should LM decide to seek a Rule 35 independent medical evaluation as part of the discovery process, any expert retained will want to review those earlier records as part of your health history. Thus, we do think medical provider information that predates the early 2020s is discoverable and may provide information relevant to your claims of emotional distress. We will agree to limit the request to January 1, 2015, to the present.

With respect to Dr. Natalie Engelbrecht's records: yes, we would like to receive the intake questionnaire from you and believe that information would be responsive to our discovery requests. However, we also want to obtain from Dr. Engelbrecht any other information she may have relied upon in creating the report for you. And for that we will need to ask her directly. Please provide us with that release before the end of this week.

We look forward to your responses regarding the protective order and the ESI. We are happy to discuss those with the Court during the next status hearing.

On the point of the status hearing, I will copy you on my communication to the Court, but I need to ask that we move that hearing either to the morning of the 4th or to another day (either the following Friday or the week after). I am scheduled to be in a different Court proceeding on September 4 at 1:00 p.m., the time currently scheduled by Magistrate Judge Weisman.

Thank you – Erin Foley

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From: summer.campbell0410@gmail.com <summer.campbell0410@gmail.com>
Sent: Monday, August 25, 2025 11:21 AM
To: Foley, Erin Dougherty <EDFoley@seyfarth.com>
Cc: Remish, Madeline E. <mremish@seyfarth.com>
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Good afternoon,

I am writing in response to your request that I supplement my response to Interrogatory 10. The objections I raised in my original answer stand. The request for medical documentation dating back to 2011 - when I was a freshman in high school - is disproportionate to the needs of this case under FRCP Rule 26(b)(1).

I have already identified every mental health provider I have treated with. Any additional medical paperwork dating back to 2011 would be limited to routine school immunizations, across three states, and would not expand upon or alter my mental health history. Regarding Dr. Natalie Engelbrecht, I have provided you with her extensive Autism Spectrum Disorder Diagnostic Report. She was not a provider I regularly met with, and there would be nothing else in her file besides the initial screening portion of the diagnostic process. I can provide you with a copy of that information upon request.

Additionally, I confirm that I have received your proposed protective order. I am currently reviewing it and will provide you with my thoughts after I have had an opportunity to carefully consider its terms.

Finally, I'd like to note that we still need to discuss and agree on ESI parameters. I have not had the opportunity to fully educate myself on the subject, and I raise this only to make it clear that I am not waiving any rights with respect to ESI discovery.

Thank you,
Summer Campbell

From: Foley, Erin Dougherty <EDFoley@seyfarth.com>
Sent: Monday, August 18, 2025 5:20 PM
To: summer.campbell0410@gmail.com
Cc: Remish, Madeline E. <mremish@seyfarth.com>
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Ms. Campbell: Good afternoon.

We do not agree with your assertion that Liberty Mutual ("LM") has not complied with its obligations to respond to discovery and believe that our responses are proper, compliant, and done in accordance with the Federal Rules of Civil Procedure. We have complied with our obligations in supplementing our discovery responses and on Saturday, August 16, 2025, you received a hard copy of the documents previously produced to you electronically. Attached here are LM's supplemental Interrogatory responses.

In short, we do not believe that there are additional responses/supplementations that need to be made at this time. The documents produced are responsive to your requests and we do not believe LM is required to provide you with a more detailed narrative responses to your Interrogatories. That is the purpose of a deposition, for each side to ask follow up questions regarding the written discovery responses and about specific documents.

Additionally, we note that the medical providers you identified, and releases that you previously gave to our office (and documents received in response to some of those provider subpoenas) appear to have been for healthcare providers with whom you began treating relatively recently, i.e., in the early 2020s. As you will note from our discovery requests (your response attached here), LM requested the identification of your treaters beginning on August 28, 2011. Please supplement your answer to Interrogatory Number 10 to identify these

additional treaters and provide us with a medical release for each of those individuals. A blank release is attached here for your convenience.

In reviewing the documents you produced to us, we wish to obtain the file kept by Dr. Natalie Engelbrecht. A release for her records is attached here for your convenience. Please return the updated Interrogatory responses and executed releases to our office by Monday, August 25, 2025.

As noted, above, we disagree with your concerns regarding LM's "boilerplate, vague objections," that LM has improperly utilized Rule 33(d), that our privilege log is improper, that we are required to provide a deadline of when any "investigation continues" will be complete, or that LM's answers are non-responsive. LM is not attempting to avoid answering your requests; indeed, where objections were made, we have responded in addition to objecting. This is consistent with both the Federal Rules and standard practice.

If you disagree, we would be happy to meet and confer. Please note that we believe these discussions are most productive when done verbally, either over the phone or in person. It also may be helpful for both parties to meet with the Court to discuss your concerns, if they still remain, now that you have the documents and LM's supplemental responses.

Finally, we have also prepared a protective order for your approval to enter into with the Court. This order will protect your medical and other personal information from being disclosed outside of discovery. It is attached here for your review.

Thank you,

Erin Foley & Maddie Remish

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From: summer.campbell0410@gmail.com <summer.campbell0410@gmail.com>
Sent: Wednesday, August 13, 2025 1:54 PM
To: Foley, Erin Dougherty <EDFoley@seyfarth.com>
Cc: Remish, Madeline E. <mremish@seyfarth.com>
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Good afternoon,

I am writing in response to your email that you will not be able to comply with my stated August 14, 2025, deadline and you will instead "make every effort to respond" to the supplemental discovery request by August

22, 2025. Unfortunately, that date leaves me with less than one full week to (1) review your supplementation, (2) confer further if necessary, and (3) prepare any motion to compel before the Court's August 29, 2025, deadline. That is not a reasonable timeframe and would prejudice my ability to protect my rights as a pro se litigant under FRCP.

On July 24, 2025, I emailed you to verify your receipt of my July 21, 2025, email requesting supplementation of the documents produced on Kiteworks. In the July 24th email, I also identified four primary issues with your responses provided to Plaintiff's First set of Interrogatories and Requests to Produce, and I asked you to correct the issues:

"1. Many answers conclude with "Investigation continues". FRCP 33 requires complete answers based on information reasonably available when served. You have not requested any extension in time for these answers, and "investigation continues" is evasive and noncompliant.

2. Nearly every RFP is met with identical boilerplate objections without any explanation or factual basis. The answers to Interrogatories are similarly evasive and unsupported.

3. LM asserts attorney-client privilege and work product protection in nearly every response but has provided no privilege log.

4. Several questions across both documents remain unanswered or only partially answered."

I followed up the morning of August 8, 2025, to produce a more specific list of requested supplementations and requested you execute within 7 business days. I am willing to be flexible, but more than 4 weeks for supplementation is not timely.

I request that you provide your supplemental responses no later than end of day August 18, 2025, so that the meet-and-confer process can be completed in good faith without requiring the Court's intervention for an extension. This provides you with 11 days to supplement your response and provides me 11 days to confer with you further before the motion to compel is due.

I remain willing to discuss any remaining issues within that window, but I cannot accept a later supplementation date without seeking relief from the Court.

Thank you for your understanding,

Summer Campbell

From: Foley, Erin Dougherty <EDFoley@seyfarth.com>

Sent: Wednesday, August 13, 2025 7:55 AM

To: summer.campbell0410@gmail.com

Cc: Remish, Madeline E. <mremish@seyfarth.com>

Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Ms. Campbell, good morning.

Liberty Mutual will not be able to comply with your stated August 14, 2025, deadline to respond to your latest discovery concerns. We will make every effort to respond to you by August 22, 2025. We will agree to provide

you with hard copies of the documents produced to you and will endeavor to have those delivered to your home address as soon as practicable.

Thank you for your patience.

Erin Foley and Maddie Remish.

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From: summer.campbell0410@gmail.com <summer.campbell0410@gmail.com>
Sent: Friday, August 8, 2025 11:47 AM
To: Foley, Erin Dougherty <EDFoley@seyfarth.com>
Cc: Remish, Madeline E. <mremish@seyfarth.com>
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Good afternoon,

I am following up again to address the ongoing deficiencies in Liberty Mutual's responses to Plaintiff's First Set of Interrogatories and First Requests for Production. As I have previously communicated, the discovery provided thus far does not fully comply with the Federal Rules of Civil Procedure, and several responses are evasive, incomplete, or fail to provide sufficient information to allow me to prepare my case.

Summary of deficiencies in responses:

- Pervasive reliance on boilerplate, vague objections without specificity or factual support.
- Improper use of Rule 33(d) by referring to all documents produced while failing to provide narrative answers.
- Assertion of attorney-client/work product privileges without clear identification of what was withheld.
 - You provided a privilege log on July 25, 2025, but it fails to identify the capacities of the recipients, any attachments, a specific explanation of the subject matter to determine if legal advice was sought or revealed, or identification of what discovery question the withheld document relates to. Please correct these deficiencies.
- Repeated "Investigation continues" placeholders with no timeline or specificities, rendering the responses incomplete under FRCP 33(b)(3).

- Nonresponsive answers.

I specifically identify the problems and requested supplementation for each individual Interrogatory and Request for Production in the attached document.

Lastly, several documents produced are currently inaccessible due to formatting issues. Specifically, the OneNote file LM_001044, and all Excel files fail to open properly. I respectfully request that these documents be re-produced in accessible and standard formats. Additionally, your certificate of services states that a copy of each document was placed in the mail; however, I have not received any physical materials to date. Please confirm the mailing has occurred or provide a physical copy of the full production. Finally, given the absence of a document index or identification key, and the volume of over 2,100 pages, I also request that you provide a consolidated and sequential hard copy of the full production (LM_000001 through LM_002133) in the mail, or a digital index that identifies the general subject matter of each file. Reviewing over 450 standalone digital files without such organization places an undue burden on me as a pro se litigant.

This email is sent pursuant to Rule 37(a)(1) of the Federal Rules of Civil Procedure and Local Rule 37.2 to request a good faith resolution of deficiencies in your July 21, 2025 responses to Plaintiff's First Set of Interrogatories and your July 25, 2025 supplemental responses to Plaintiff's First set of Requests for Production. I am willing to meet and confer in good faith; however, I request that all communications occur in writing, such as email, rather than telephone. As a pro se litigant with a disability that affects my verbal communication and processing time, written correspondence allows me to fully understand, process, and respond to the issues raised. This ensures a fair and accurate exchange consistent with FRCP and local rules.

Please supplement your responses as described in the attached document, as well as the requests underlined within this email. Please provide them back to me by end of day August 14, 2025. Please confirm by end of day August 11, 2025, whether you will be supplementing these responses within the requested timeframe. I remain committed to resolving these issues cooperatively and without court intervention, but I will proceed with a motion to compel as necessary.

Thank you,

Summer Campbell

From: Foley, Erin Dougherty <EDFoley@seyfarth.com>
Sent: Friday, July 25, 2025 1:51 PM
To: summer.campbell0410@gmail.com
Cc: Remish, Madeline E. <mremish@seyfarth.com>
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Ms. Campbell, thank you for your patience.

Given your identified deadline of today, we did not feel it was necessary to acknowledge your original communication. Going forward, we will make an effort to do so.

We are providing for you here supplemental document discovery responses, which have been revised/supplemented to include bates labeled information, as you have requested. For your information, "Investigation Continues" is a proper and appropriate response when there may be additional documents or

information discovered by a party, and for which all parties have a responsibility to supplement their responses if new information becomes available.

We disagree with your contention that our responses are evasive or not compliant. However, if you have specific requests or responses that you would like us to review, please advise and we will determine if additional information is warranted. We are happy to meet and confer on any specific examples you would like to identify.

A privilege log is attached here for your review.

Finally, we attach here the draft joint status report; feel free to add information as you feel necessary. Please return to us by 10 a.m. Monday, so that we may review/revise before filing the report at 12 noon, per the Court's order.

Have a nice weekend. Erin Foley and Maddie Remish

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From: summer.campbell0410@gmail.com <summer.campbell0410@gmail.com>
Sent: Thursday, July 24, 2025 11:10 AM
To: Remish, Madeline E. <mremish@seyfarth.com>; Foley, Erin Dougherty <EDFoley@seyfarth.com>
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Good morning,

I am reaching out again to address the deficiencies in Liberty Mutual's discovery responses to Plaintiff's First Set of Interrogatories and First Requests for Production. More than two business days have passed with no acknowledgement to my request for supplementation.

In previous correspondence, I drew attention to the lack of specificity when referring to documents provided. The responding party must identify specific documents in a way that allows me to locate and understand them just as easily as you can. A blanket reference to the entire production of 450+ documents is not sufficient.

In addition to the issues I previously brought to your attention, I would like to raise the following concerns:

1. Many answers conclude with “Investigation continues”. FRCP 33 requires complete answers based on information reasonably available when served. You have not requested any extension in time for these answers, and “investigation continues” is evasive and noncompliant.
2. Nearly every RFP is met with identical boilerplate objections without any explanation or factual basis. The answers to Interrogatories are similarly evasive and unsupported.
3. LM asserts attorney-client privilege and work product protection in nearly every response but has provided no privilege log.
4. Several questions across both documents remain unanswered or only partially answered.

As a pro se plaintiff, I am doing my best to follow the Federal Rules of Civil Procedure and local rules. I respectfully request your cooperation in correcting these issues so that I do not need to involve the Court. I will be following up with an email that satisfies the pre-motion meet-and-confer requirements. However, I want to emphasize again that the lack of specificity in identifying documents must be corrected and corrected quickly.

As stated previously, I set a deadline of tomorrow, July 25th 2025, for this supplementation due to the joint status update due to the Court on July 28th 2025. Please identify how you plan to proceed with this request.

Thank you,

Summer Campbell

From: summer.campbell0410@gmail.com <summer.campbell0410@gmail.com>
Sent: Monday, July 21, 2025 5:54 PM
To: 'Remish, Madeline E.' <mremish@seyfarth.com>
Cc: 'Foley, Erin Dougherty' <EDFoley@seyfarth.com>
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Good evening Ms. Remish,

The link you provided allows for downloads, thank you for updating.

Please inform me of how you plan to proceed with identifying the documents and the specific interrogatory or RTP they correspond to.

Thank you,

Summer Campbell

From: Remish, Madeline E. <mremish@seyfarth.com>
Sent: Monday, July 21, 2025 3:24 PM
To: summer.campbell0410@gmail.com
Cc: Foley, Erin Dougherty <EDFoley@seyfarth.com>
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Hello Summer,

The Kiteworks settings have been updated to allow for downloads. See link here:

<https://kiteworks.seyfarth.com/w/f-ab814fbb-8c20-41d6-8d94-cd735edf7202>. Please confirm that you can download the documents now. We are also happy to send you hard copies of the production.

Thanks!

Madeline E. Remish | Associate | Seyfarth Shaw LLP
233 S. Wacker Drive | Suite 8000 | Chicago, Illinois 60606-6448
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From: summer.campbell0410@gmail.com <summer.campbell0410@gmail.com>
Sent: Monday, July 21, 2025 2:48 PM
To: Remish, Madeline E. <mremish@seyfarth.com>
Cc: Foley, Erin Dougherty <EDFoley@seyfarth.com>
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Good afternoon Ms. Remish,

The current method of production via Kiteworks does not allow for documents to be downloaded, saved, or reviewed in a functional manner. Additionally, the documents have not been organized or labeled in a way that identifies which request each document is in response to.

As you know, Rule 34(b)(2)(E) of the Federal Rules of Civil Procedure requires that documents be produced “as they are kept in the usual course of business” or organized and labeled to correspond to the categories in the request. To enable meaningful review and avoid unnecessary motion practice, I respectfully request that you (1) produce all documents in a downloadable format and (2) organize the documents to identify the specific interrogatory or RFP it is in response to.

Please provide this supplemental production by July 25th, 2025 so that a joint status report can be completed by July 28th per the court’s order.

Should you have any questions or wish to discuss alternative methods for production, please reply to this email.

Thank you,

Summer Campbell

From: Remish, Madeline E. <mremish@seyfarth.com>
Sent: Monday, July 21, 2025 11:37 AM
To: summer.campbell0410@gmail.com
Cc: Foley, Erin Dougherty <EDFoley@seyfarth.com>
Subject: RE: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Hello Summer,

Also attached is Ms. Domzal's verification.

Thanks!

Maddie

Madeline E. Remish | Associate | Seyfarth Shaw LLP
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From: Remish, Madeline E.
Sent: Monday, July 21, 2025 9:51 AM
To: summer.campbell0410@gmail.com
Cc: Foley, Erin Dougherty <EDFoley@seyfarth.com>
Subject: Liberty Mutual Responses to Plaintiff's Discovery Requests 23-cv-05101

Good morning Summer,

Attached are Liberty Mutual's responses to your discovery requests. I am sending you a link as well through Kiteworks to access the responsive documents. Let me know if you have any issues viewing the documents.

Thanks!

Maddie